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**Cc:** [Chip Humphrey](#); [Lori Cora](#)  
**Subject:** Management Goal and Objectives for Portland Harbor  
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Jim, Bob and Rick, as you are aware, EPA's December 2, 2005 Identification of Round 3 Data Gaps Memo (Data Gaps Memo) included a management goal and management objectives for the Ecological Risk Assessment. This topic was further discussed during our December 13, 2005 in Centralia. The purpose of this email is to clarify the language provided in Section 4.1 of the Data Gaps Memo regarding the scope of the management goal and management objectives.

Consistent with EPA guidance on ecological risk assessments (Guidelines for Ecological Risk Assessment, EPA/630/R-95/002F, April 1998), EPA included a management goal and a series of management objectives to guide the ecological risk assessment. The management goal presented in the December 2, 2005 Data Gaps Memo, represents a broad, overarching goal for the Lower Willamette River and explicitly recognizes the need for integration of restoration activities and other regulatory programs with the CERCLA RI/FS.

In contrast to the management goal, management objectives were included which describe measurable objectives for the CERCLA RI/FS. The management objectives include a primary management objective and specific objectives for each class of ecological receptors. The primary objective is to "Reduce contaminant concentrations ..... to levels that are protective of the environment and **support** the restoration and maintenance [of] aquatic and riparian habitats" (emphasis added). The specific objective for each class of ecological receptor is to reduce contaminant concentrations and/or eliminate the availability of contaminants to protect ecological receptors from "deleterious effects."

As stated at our December 13, 2005 meeting, the term "deleterious effects," as mentioned in the management objectives does not go beyond direct linkages to survival, growth and reproduction. As stated in Section 4 of the Scope of Work (SOW) attached to the Administrative Order on Consent: "While there are many potential goals that may, and should, be considered while developing an RI/FS work plan, the protection of survival, growth, and reproduction of the following ecological and human receptors will be directly addressed by Respondents with respect to releases or threatened releases of any hazardous substances to the in-water portion of the Site."

We hope this clarifies the language provided in Section 4.1 of our December 2, 2005 Data Gaps Memo.

If you have any questions in this matter, please contact Chip or myself. Legal inquiries should be addressed to Lori Cora.

Thanks, Eric